



Veterans Affairs
Canada

Anciens Combattants
Canada

Annual Report on the Administration of the *Privacy Act* 2014-2015



The Honourable Erin O'Toole, P.C., C.D., M.P.
Minister of Veterans Affairs

Canada

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1. Introduction

The *Privacy Act* provides members of the public with the legislated right to access and request the correction of personal information about them held by federal government institutions. The Act also imposes strict obligations related to the collection, accuracy, use, disclosure, retention and disposition of personal information.

Veterans Affairs Canada (VAC) and the Office of the Veterans Ombudsman (OVO) take the responsibility to protect the privacy and rights of all Veterans and their families very seriously.

This annual report on the administration of the *Privacy Act* outlines how VAC and the OVO fulfilled their responsibilities under the *Privacy Act* during the fiscal year beginning April 1, 2014 and ending March 31, 2015.

2. Preparation and Tabling of the Annual Report

In accordance with section 72 of the *Privacy Act*, the Minister of Veterans Affairs, as head of the institution, is required to prepare an annual report on the administration of the Act and this report is to be tabled in Parliament.

3. Mandate of Veterans Affairs Canada

Canada's development as an independent country with a unique identity stems partly from its proud military achievements. Veterans Affairs Canada exists to help those whose courageous efforts gave us this legacy and contributed to Canada's growth as a nation.

VAC's mandate is set out in the *Department of Veterans Affairs Act*. It charges the Minister of Veterans Affairs with responsibility for "the care, treatment or re-establishment in civil life of any person who served in the Canadian Forces or Merchant Navy or in the naval, army, air forces or merchant navies of Her Majesty, of any person who has otherwise engaged in pursuits relating to war, and of any other person designated . . . and the care of the dependants or survivors of any person referred to." Veterans Affairs Canada is also responsible for keeping alive the achievements and sacrifices of those who served Canada in times of war, military conflict and peace.

Responsibilities

VAC achieves its mandate by providing services and benefits that respond to the needs of Veterans, other individuals and their families. The Department has three main roles:

- **Provider** of disability compensation and financial support: Veterans Affairs Canada administers programs which recognize and compensate for the disabling effects of service-related disabilities. The Department also provides financial support and

assistance when career-ending or service-related disabilities affect one's ability to earn an income.

- **Funder** for health care and re-establishment services: The Department works with multiple levels of government to ensure access to health programs that enhance the well-being of Veterans and other eligible individuals and promote independence. The Department also provides financial support to Veterans and their families to ease their transition to civilian life.
- **Catalyst** for national and international remembrance: The Department keeps alive the achievements and sacrifices of those who served Canada in times of war, military conflict and peace, and promotes the importance of these efforts for Canadian life as it is today. Veterans Affairs Canada fosters remembrance of the contributions made by Canada's war dead and Veterans, and maintains and operates 14 memorial sites in Europe.

4. Mandate of the Office of the Veterans Ombudsman

The Office of the Veterans Ombudsman helps ensure that the sacrifices of Canada's Veterans and their families are recognized through the provision of services, benefits, and support in a fair, accessible, and timely manner. As an impartial and independent officer, the Veterans Ombudsman reports directly to the Minister of Veterans Affairs and works to ensure that Veterans, men and women of the Canadian Armed Forces (CAF), members and former members of the Royal Canadian Mounted Police (RCMP), as well as their families and other individuals that are clients of VAC are treated fairly and in accordance with the Veterans Bill of Rights.

The mandate of the Ombudsman, found in the Order-in-Council P.C. 2007-530, is to

- Review and address complaints by Veterans and other individuals served (by VAC) and their representatives arising from the application of the provisions of the *Veterans Bill of Rights*;
- Identify and review emerging and systemic issues related to programs and services provided or administered by the Department or by third parties on the Department's behalf that impact negatively on Veterans and other individuals served (by VAC);
- Review and address complaints by Veterans and other individuals served (by VAC) and their representatives related to programs and services provided or administered by the Department or by third parties on the Department's behalf, including individual decisions related to the programs and services for which there is no right of appeal to the Veterans Review and Appeal Board;

- Review systemic issues related to the Veterans Review and Appeal Board; and
- Facilitate stakeholders' access to programs and services by providing them with information and referrals.

5. Organization

I Veterans Affairs Canada Access to Information and Privacy Office

The VAC Access to Information and Privacy (ATIP) Coordinator acts on behalf of the Minister of Veterans Affairs and the Deputy Minister to ensure that the Department's responsibilities under the *Access to Information Act* and the *Privacy Act* are met. The ATIP Coordinator reports directly to the Assistant Deputy Minister, Human Resources and Corporate Services Branch.

The main activities of VAC's ATIP Office consist of the following:

- Processing requests for information submitted under the *Access to Information Act* and the *Privacy Act*;
- Developing policies, procedures and guidelines in support of Access to Information and Privacy legislation and central agency requirements;
- Promoting awareness of both acts to ensure employees understand their roles and responsibilities;
- Monitoring compliance with both acts and central agency requirements;
- Preparing annual reports to Parliament;
- Coordinating and providing direction to program managers regarding the completion of Privacy Impact Assessments (PIAs);
- Coordinating the resolution of any complaints against VAC which have been submitted to the Information Commissioner under the *Access to Information Act* and to the Privacy Commissioner under the *Privacy Act*;
- Providing centralized management of privacy breaches;
- Providing VAC staff with advice and guidance on ATIP issues;
- Providing support and recommendations to the Department's Chief Privacy Officer and the Corporate Management Committee (CMC); and
- Supporting VAC in meeting its commitments to openness and transparency through proactive disclosure of information and the release of information via informal avenues.

Processing of access to information and privacy requests is centralized within the ATIP Office in Charlottetown, Prince Edward Island. The ATIP Office has two units: an Operations team and a Policy and Governance team. In 2014–2015, the VAC ATIP Coordinator's Office employed a total of 34.48 full-time equivalents (FTEs).

The ATIP Coordinator's Office supports and maintains a network of 23 ATIP Liaison Officers (22 Liaison Officers in the Charlottetown Head Office and one representing the Regions). The Liaison Officers are responsible for retrieving information from their areas when a request is received, and identifying information which may qualify for an exemption under the acts.

II Office of the Veterans Ombudsman Access to Information and Privacy Unit

The Veterans Ombudsman, Deputy Ombudsman and Executive Director, Operations (formerly Director General of Operation in Delegation Order in Annex 1), Legal Advisor, and Director, Corporate Services and Charlottetown Operations have full authority for the OVO to exercise the powers, duties and functions of the Minister as the Head of Veterans Affairs, under the provisions of the Acts and related regulations (see Annex 1). Although four positions have been delegated full authority, the Veterans Ombudsman has been identified as the senior-most official within the OVO responsible for Access to Information and Privacy. The Director, Corporate Services and Charlottetown Operations, is responsible for operational management of the Access to Information and Privacy functions within the OVO.

The OVO's Access to Information and Privacy Unit in Charlottetown, Prince Edward Island ensures that the Office's responsibilities under both Acts are met. Processing of requests is centralized within the unit. The unit consists of the Director, Corporate Services and Charlottetown Operations, ATIP Coordinator, and a Liaison Officer. The Legal Advisor is also responsible for the final review and release of information to the Requester. These four full-time staff members were assigned to the administration of both Acts on a part-time (as required) basis during the 2014–2015 reporting period, which represents 0.28 of a person year.

The main activities of the OVO ATIP unit include:

- Timely completion of requests for information under the *Access to Information Act* and the *Privacy Act* in compliance with ATIP legislation, regulations and Treasury Board Secretariat policy instruments;
- Developing and maintaining OVO policies, procedures, guidelines, and processes in support of Access to Information and Privacy legislation and central agency requirements;
- Promoting awareness of both Acts within the OVO to ensure that employees understand their roles and responsibilities;
- Monitoring OVO compliance with both Acts and central agency requirements;
- Preparing and providing information specific to the OVO to VAC for inclusion in annual reports to Parliament;
- Completing and coordinating the completion of Privacy Impact Assessments (PIAs) for the OVO;
- Coordinating the resolution of any complaints against OVO which have been submitted to the Information Commissioner under the *Access to Information Act* and to the Privacy Commissioner under the *Privacy Act*;
- Providing centralized management of privacy breaches within the OVO;

- Providing advice and guidance to OVO staff on ATIP issues; and
- Supporting the OVO in meeting its commitments to openness and transparency through proactive disclosure of information and the release of information via informal avenues.

6. Delegation Order

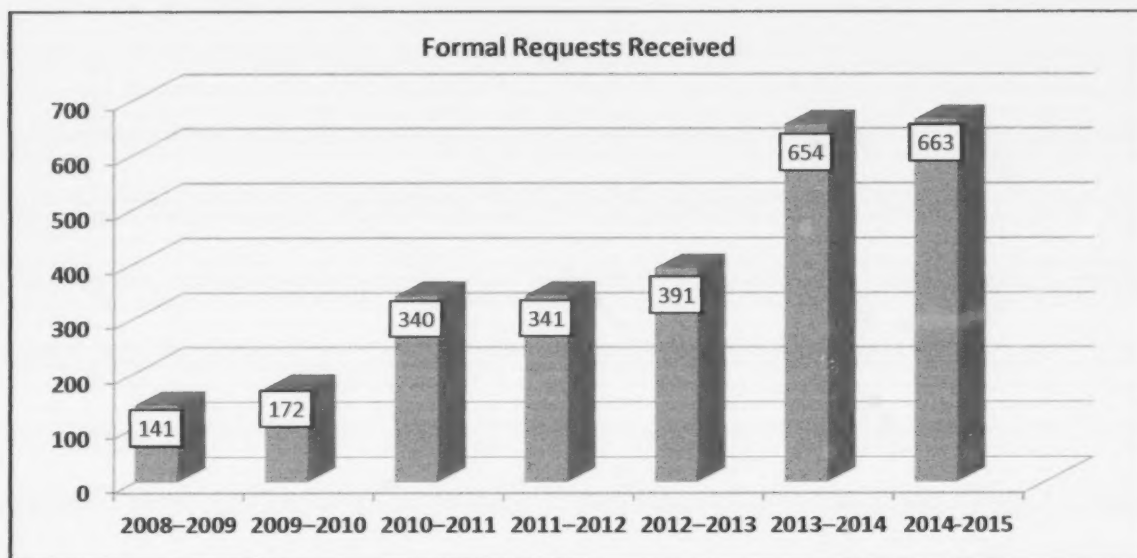
The responsibilities associated with the administration of the *Privacy Act* are delegated to departmental officials and OVO officials through a delegation order signed by the Minister of Veterans Affairs (attached as Annex 1).

7. Interpretation of the *Privacy Act* Statistical Report

The following summary provides an interpretation of statistical data on the administration of the *Privacy Act* at VAC and the OVO between April 1, 2014, and March 31, 2015. A more detailed breakdown of processing statistics can be found in Annex 2 (VAC and OVO statistical report) and a separate interpretation specific to the OVO in Annex 3 (OVO statistical report).

Formal Requests under the *Privacy Act*

Between April 1, 2014 and March 31, 2015, the Department received 663 formal requests for information under the *Privacy Act* (662 by VAC and one by the OVO). This represents a 1% increase (or 9 requests) from 2013–2014 (see Annex 4 for a five-year comparison). While the Department received more formal requests in 2014–2015, the number of informal requests decreased. As a result, the total number of requests received in this reporting period increased only slightly.



On April 1, 2014, 179 open formal requests were carried forward from the previous year. Combined with the 663 requests received in 2014–2015, a total of 842 requests required action during the 2014–2015 fiscal year.

A total of 771 formal requests were completed during the reporting period (770 by VAC and one by the OVO). At the end of the fiscal year, there were 71 outstanding formal requests carried forward to the 2015–2016 fiscal year.

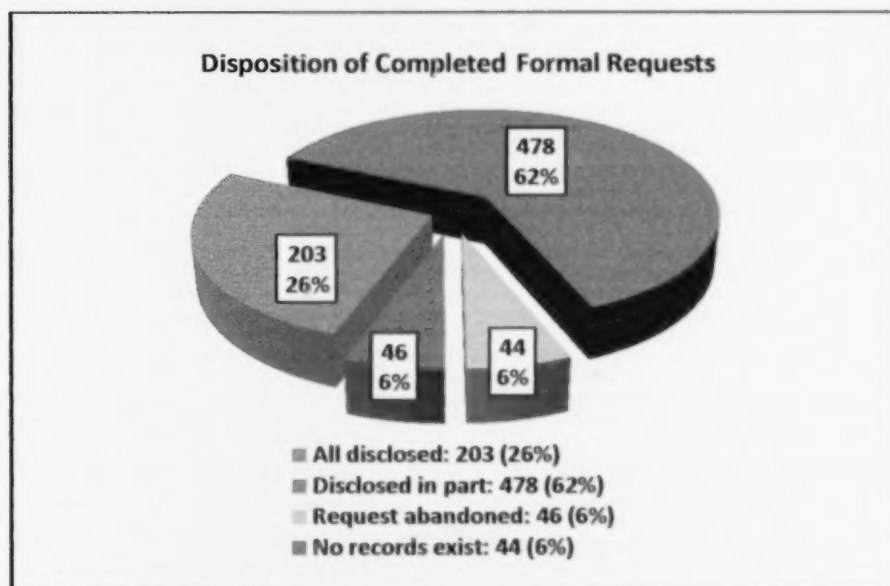
In April 2014, VAC joined several other government departments in accepting requests for information through the ATIP Online Request system. This system allows clients and other members of the public to submit requests for personal information under the *Privacy Act*, or for other information held by the institution under the *Access to Information Act*. From the launch date in April 2014 to March 31, 2015, VAC received 290 formal requests for information under either the *Access to Information Act* or the *Privacy Act*. This represents nearly a third of all formal requests (29%) submitted to the Department in the 2014–2015 fiscal year.

Following implementation of the ATIP Online Request system, the Department observed that an increasing number of individuals are filing requests for personal information under the *Access to Information Act* instead of the *Privacy Act*. The ATIP Office has worked with the Treasury Board Secretariat to add information about both the *Access to Information Act* and the *Privacy Act* in the ATIP Online Request system in an effort to help educate requesters. When combining these ATI requests for personal information with the number of formal Privacy requests, it is noted that the number of requests for personal information has actually increased from the 2013–2014 fiscal year.

Disposition of Requests Completed

In total, 771 formal requests were completed during the 2014–2015 fiscal year compared with 767 requests completed in the previous year. During the reporting period, the Department processed 434,287 pages (including 80 pages processed by the OVO) and disclosed 256,953 pages (including 37 pages disclosed by the OVO). In comparison, the Department processed 252,030 pages and disclosed 228,010 pages in 2013–2014. This represents a 72.3% increase in pages processed and a 12.7% increase in pages disclosed for formal privacy requests compared with the previous reporting period.

The disposition of the 771 requests completed in 2014–2015 is illustrated in the following chart:



I Exemptions Cited

Canadians have a right of access to their personal information but the *Privacy Act* identifies specific exemptions for which the need for confidentiality of certain information is recognized. An exemption is a provision under the Act that authorizes the head of the government institution to not disclose personal information in response to a privacy request. VAC invoked 508 exemptions¹ (507 by VAC and one by the OVO) under sections 19, 21, 22, 25, 26, 27 and 28 of the *Privacy Act*. The most frequently applied exemption was section 26, which is used to protect information about an individual other than the requester. The following table identifies the number of requests where specific types of exemptions were applied.

Exemptions cited	2012–2013	2013–2014	2014–2015
Paragraph 19(1)(a) (Information obtained in confidence)	0	0	1
Section 21 (International affairs and defence)	1	2	1
Paragraph 22(1)(a)(i) (Law enforcement and investigation)	1	2	0
Paragraph 22(1)(a)(ii) (Law enforcement and investigation)	0	1	1
Paragraph 22(1)(b) (Law enforcement and investigation)	0	2	1
Section 25 (Safety of individuals)	0	1	3

¹ For statistical purposes, an exemption is counted only once when it is applied to a file multiple times.

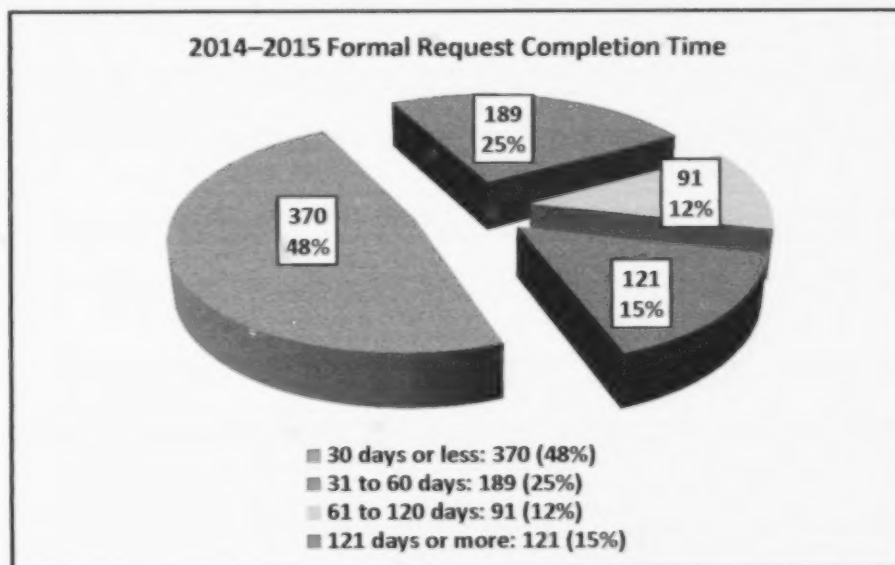
Section 26 (Information about another individual)	103	392	484
Section 27 (Solicitor-client privilege)	9	4	9
Section 28 (Medical record)	2	7	8
Total exemptions cited	116	411	508

II Exclusions Cited

An exclusion is information to which the *Act* does not apply as described in sections 69 and 70 of the *Privacy Act*. Examples include published material, material available for purchase by the public, material placed in the Library and Archives of Canada or confidences of the Queen's Privy Council for Canada. During this reporting period, there were no exclusions under sections 69 and 70.

III Completion Time

During the 2014–2015 reporting period, 48% of the formal requests were completed in 30 days or less (VAC completed 369 and the OVO completed one); 25% were completed within 31 to 60 days; 12% were completed within 61 to 120 days; and 15% of the requests requiring additional time and effort were completed in 121 days or more. A total of 370 requests were completed within the legislated time frame, an increase of 60 requests as compared with 2013–2014.



IV Extensions

During the reporting period, a total of 285 requests were extended by VAC. Of these, 237 were extended because processing the file within the original timelines would have unreasonably interfered with the Department's operations. The other 48 extensions were due to consultation with other institutions.

The OVO did not apply any extensions during the 2014–2015 reporting period.

V Translation

VAC received one privacy request requiring translation during the 2014-2015 reporting period. In comparison, there were no privacy requests (VAC or OVO) requiring translation during the 2013-2014 reporting period.

VI Format of Information Released

Individuals may obtain the information they have requested in three ways:

- 1) Receiving copies of the material;
- 2) Examining the information during an arranged time; or
- 3) Examining and receiving copies of the information.

Of the 771 formal requests completed by the Department, 46 were abandoned by the applicant, 44 could not be processed because records did not exist, and in 681 cases the applicants received copies of the material requested (either fully or in part).

Format of Information Released	2012– 2013	2013– 2014	2014– 2015
Copies of material in full or in part	228	652	681
Abandoned by applicant	28	67	46
No records exist	16	48	44
Transferred to another institution	0	0	0
Nothing disclosed (exemption or exclusion)	0	0	0

VII Corrections and Notations

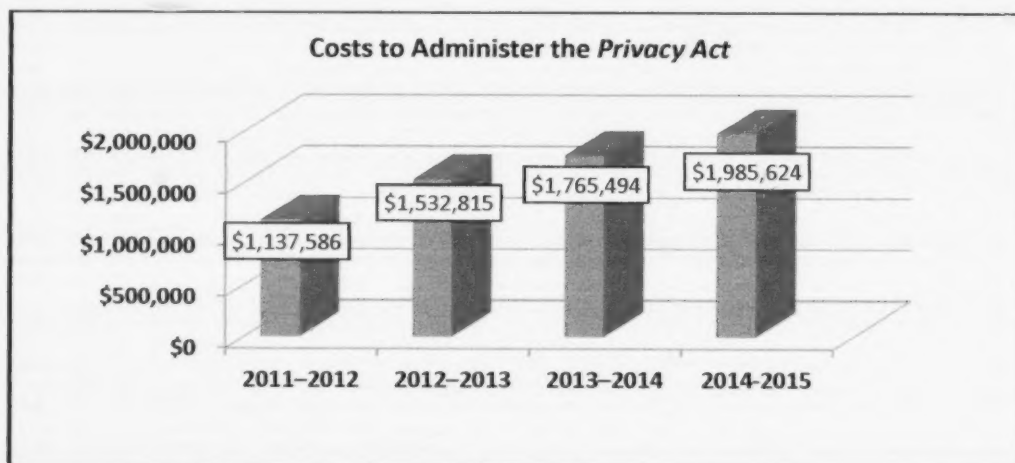
Under the *Privacy Act*, individuals are entitled to request correction and notation of personal information when they believe there is an error or omission therein. VAC received six requests for corrections (none received by the OVO) during the 2014–2015 reporting period, and five corrections were carried over from the 2013–2014 fiscal year. One correction was granted, two

corrections were denied as the information was not incorrect and eight corrections have been carried forward to be actioned in the 2015–2016 fiscal year.

In comparison, the Department had five requests for corrections (five by VAC none by the OVO) during the 2013-2014 reporting period.

VIII Costs

The VAC and OVO ATIP Offices spent a combined total of \$1,985,624.00 to administer the *Privacy Act* during the reporting period. Staff salaries accounted for \$1,633,340 while costs of Privacy Impact Assessment (PIA) contracts and other professional services contracts amounted to \$217,853.00, Other administrative costs, such as training, travel and supplies, amounted to \$134,431. The increased cost during the fiscal year can be linked to the investment VAC made to continue to address the high volume of Privacy requests in the backlog. As of March 31, 2015, the VAC ATIP Office no longer reports a backlog of requests.



8. Other ATIP Functions

In addition to processing *Access to Information Act* and *Privacy Act* requests, the VAC ATIP Office also handled a variety of requests from within the Department, including the following:

- Analysis and response to privacy operational and policy questions;
- Review of new forms for the collection of personal information;
- Development of appropriate Privacy Notice Statements for new forms;
- Evaluation of contracts and Memoranda of Understanding; and
- Provision of support in preventing, addressing and containing potential privacy breaches.

In addition to processing *Access to Information Act* and *Privacy Act* requests, the OVO ATIP Office also handled a variety of requests from within the Office, including the following:

- Analysis and response to internal access to information and privacy questions;
- Evaluation of contracts; and,
- Provision of support in preventing potential privacy breaches.

9. Consultations

VAC received six requests for consultations from other government institutions and organizations during the 2014–2015 reporting period and one consultation was carried forward into the 2014–2015 fiscal year. A total of seven consultations were completed during the 2014–2015 fiscal year. Of the cases completed during the 2014–2015 reporting period, all seven consultations were sought by other government institutions.

This year, the OVO began to report on consultations received from the VAC ATIP Office. During the 2014–2015 reporting period, the OVO received and completed one request for consultation from the VAC ATIP Office.

10. Training and Awareness

During this fiscal year, departmental staff received ATIP-related training through a variety of mediums. Over the course of the year, privacy training was delivered to 756 participants.

Integrated Security / ATIP Training

VAC's mandatory Security Orientation Training, offered to all employees upon entering the organization and then at periodic intervals, highlights

- Need-to-Know principle;
- Concept of privacy breaches;
- Rules regarding accessing information;
- Disciplinary actions resulting from accessing personal information without authorization; and
- Overview of ATIP legislation and fundamentals.

During the reporting period, a total of 698 participants attended 148 training sessions.

Manager and Supervisor Orientation Program (MSOP)

The VAC ATIP Office delivered an hour-long session on ATIP principles and best practices during one MSOP course, with a total of 8 participants. The session provides an overview of the *Access to Information Act* (Duty to Assist), an overview of the *Privacy Act* (Personal Information), and the roles and responsibilities related to privacy management such as the collection of personal information, privacy notices, privacy awareness, and privacy breach management.

Data Privacy Day

On January 28, 2015, VAC's ATIP Office promoted Data Privacy by raising awareness of privacy on VAC's internal intranet site. The focus of the privacy awareness was data privacy and how to keep your personal information private.

Office of the Veterans Ombudsman (OVO) – specific training

In addition to taking part in Departmental ATIP training, a new Manager within the OVO received detailed ATIP training, and 19 staff members, within the OVO, attended two refresher training sessions (one in Charlottetown and one in Ottawa) on the *Access to Information Act* and the *Privacy Act* and their responsibilities.

Access to Information and Privacy Act Training Session

During the fiscal year, VAC delivered a full day training session on ATIP principles with a total of 30 participants. The training session provided participants with a more in-depth understanding of the interpretation and the application of the exemption and exclusion provisions of both the *Access to Information Act* and the *Privacy Act*.

11. Policies, Guidelines and Procedures

VAC developed the following policies and guidelines in the 2014–2015 fiscal year:

- **Privacy Protocol for Non Administrative Purposes** – This protocol provides guidance to VAC employees on the non-administrative uses of personal information; outlines the privacy protection principles and procedures to be followed when collecting, using or disclosing personal information for a non-administrative purpose; and ensure that the collection, use or disclosure of personal information for non-administrative purposes, is carried out in compliance with the *Privacy Act*, the *Privacy Regulations* and related privacy policy requirements of the Treasury Board of Canada Secretariat (TBS).

The non-administrative use of personal information is not related to any decision-making process that directly affects an individual, but may be used for research, statistical, audit, and evaluation purposes.

- **ATIP Operational Process for the Declassification of Classified and Protected Documents** – This process provides guidance to the ATIP Directorate on the declassification of classified and protected records prior to release, through a privacy or access to information request.
- **The Disclosure of Personal Information to Policing Services and Federal Investigative Bodies - Paragraph 8(2)(e) of the *Privacy Act*** – This provides guidance about the release of personal information, for the enforcement of any law of Canada, of any province, or for carrying out a lawful investigation.

The OVO maintained and monitored current Privacy policies, guidelines, and procedures and finalized a Privacy Protection Procedures Manual during the 2014-2015 reporting period.

12. Complaints and Investigations

In the 2014–2015 reporting period, the Privacy Commissioner received two VAC-related complaints. Of the two complaints received, both were related to use and disclosure of personal information.

VAC had 23 complaints carried over from previous fiscal years, and combined with the 2 received in 2014–2015, there were 25 complaints requiring action. Eighteen complaints received a ruling during the reporting period and 7 have been carried over to 2015–2016. Of the complaints that received a ruling, six were deemed not well-founded, 9 were ruled as well-founded, two were discontinued and one was settled in the course of investigation. The majority were use and disclosure, and denial of access complaints (each at 39%).

No complaints against the OVO were received by the Privacy Commissioner during the 2014–2015 reporting period.

13. Privacy Impact Assessment

In accordance with the Treasury Board Secretariat's Directive on Privacy Impact Assessment, the Department conducts PIAs on new programs, systems or policies, or when substantial modifications are made to an existing program, system or policy, and when services are contracted to another party. The purpose of a PIA is to ensure that privacy implications or risks are appropriately identified, assessed and resolved before a new or substantially modified program or activity involving personal information is implemented. Initiatives are assessed and, when possible privacy concerns are identified, a mitigation strategy is developed to eliminate or lower the risk.

During the 2014–2015 fiscal year, VAC submitted one PIA to the Office of the Privacy Commissioner (OPC) and Treasury Board Secretariat (TBS). The following initiative was assessed during the fiscal year.

Private Storage

Private Storage will enable VAC to send non-archival records to Iron Mountain Canada, a contracted body, for storage. The service provides records management including transportation, storage, maintenance, retrieval, delivery and destruction services of paper records formerly in storage at both Library and Archives Canada and in VAC offices.

An addendum to VAC's War Veterans Allowance PIA and an update on the Financial Benefits Program PIA was also completed during this reporting period. These were also submitted to the Office of the Privacy Commissioner and the Treasury Board Secretariat.

As a result of announcements related to new programs and benefits, VAC is working on numerous Privacy Impact Assessments. Upon completion VAC will submit the PIAs to the Treasury Board Secretariat and the Office of the Privacy Commissioner.

The VAC's PIA summaries can be found at www.veterans.gc.ca/eng/department/reports/pia.

The OVO did not complete any PIAs during the 2014-2015 reporting period. The OVO's PIA summaries can be found at: <http://www.ombudsman-veterans.gc.ca/eng/transparency/pia>.

14. Disclosures Pursuant to Paragraph 8(2)(m)

VAC had one disclosure of personal information pursuant to paragraph 8(2)(m)(i) of the *Privacy Act* during the 2014-2015 reporting period. The paragraph 8(2)(m) allows for disclosure for any purpose where the public interest in disclosure clearly outweighs any invasion of privacy that could result from the disclosure. The Privacy Commissioner was notified before the disclosure as required under subsection 8(5) of the *Privacy Act*.

OVO had no disclosures of personal information pursuant to paragraph 8(2)(m) of the *Privacy Act* during the 2014-2015 reporting period.

15. Appeals to the Courts

There were no appeals to the courts (for VAC or the OVO) during the reporting period.

16. Monitoring – Privacy Requests and Requests for Correction

I Veterans Affairs Canada

Monitoring

There is a robust case monitoring system in place. Using reports produced by the case management software tool, the status of requests is reviewed by ATIP Team Leaders, Managers, and the Director on a weekly basis to monitor upcoming deadlines. In addition, monthly statistical reports indicating the number of incoming and outgoing privacy requests, as well as the number of overdue requests, are prepared for the ATIP Coordinator.

Requests for Correction

VAC receives very few requests for correction of personal information each year. Time frames for responding to these requests are monitored informally. Depending on the complexity of the request, officials as high as the ATIP Coordinator may be advised, as well as senior-officer-level officials in the related program area.

II Office of the Veterans Ombudsman

The Office of the Veterans Ombudsman uses a tracking spreadsheet to monitor processing of requests for personal information and correction of personal information on a weekly basis when requests are being processed. This tracking spreadsheet is maintained by the ATIP Coordinator and the ATIP Liaison Officer. Any anticipated issues with processing are escalated to the Director, Corporate Services and Charlottetown Operations.

17. Privacy Breaches

I Veterans Affairs Canada

During the 2014-2015 fiscal year, 78 breaches impacting 213 individuals were confirmed by VAC. VAC treats every breach as a serious matter and reports them to the Office of the Privacy Commissioner and the Treasury Board Secretariat.

The *VAC Privacy Breach Policy* as well as the *Privacy Breach Procedures and Guidelines Manual* are available to educate staff on privacy breaches, to raise awareness on how to prevent privacy breaches, their roles and responsibilities regarding privacy, and how privacy breaches must be handled for effective resolution. An in-depth overview of roles and responsibilities including, but not limited to, Senior Managers, ATIP, Security, Information Technology, Communications and Audit and Evaluation Staff, is provided in the Procedures and Guidelines.

Communication and notification strategies include an escalation process in which all staff are required to report potential privacy breaches to ATIP as soon as possible. The ATIP office investigates and notifies the Office of the Privacy Commissioner and the Treasury Board Secretariat, and ensures that the affected individuals are notified in writing. Regular Privacy Breach updates are provided to Senior Management.

II Office of the Veterans Ombudsman

The OVO had no privacy breaches to report during this reporting period.

The Privacy Protection Procedures Manual that the OVO finalized during the 2014-2015 reporting period identifies roles and responsibilities within the OVO for handling breaches. The OVO also follows VAC policies, procedures, and guidelines as this is a shared area of responsibility between VAC and the OVO (as identified in the Memorandum of Understanding for the Administration of the *Access to Information and Privacy Acts* between VAC and the OVO).

Annex 1: VAC and OVO Delegation Order – *Privacy Act* and *Privacy Regulations*

Delegation Order - *Privacy Act* and *Privacy Regulations*

The Minister of Veterans Affairs, pursuant to section 73 of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the Minister as the head of Veterans Affairs Canada, under the provisions of the Act and related regulations set out in the schedule below. This designation replaces all previous delegation orders.

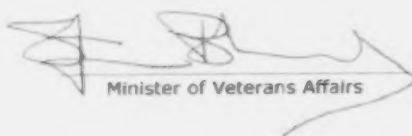
Privacy Act Provisions and associated descriptions		Column 1 Deputy Minister and Associate DM	Column 2 All Assistant Deputy Ministers, the Director General of Communications and senior management positions within the Department of Veterans Affairs Canada that reports directly to the positions outlined in Column 1.	Column 3 Privacy Coordinator within the Department of Veterans Affairs Canada	Column 4 Any senior analyst position (PM-05 or above) within Department of Veterans Affairs that reports directly to the position outlined in Column 3.	Column 5 Any analyst position within the Access to Information and Privacy (AIP) of the Department of Veterans Affairs that reports directly to the positions outlined in Column 4.
8(2)(j)	Disclosure for research or statistical purposes	X	X	X		
8(2)(m)	Disclosure in the public interest or in the interest of the individual	X				
8(5)	Notice of disclosure under paragraph 8(2)(m)	X				
9(4)	Consistent uses	X	X	X	X	
10	Personal information banks	X	X	X	X	
14(a)	Notice when access requested	X	X	X	X	
14(b)	Giving access to the record	X	X	X	X	
15	Extension of time limits	X	X	X	X	X
17(2)(b)	Language of access	X	X	X	X	X
17(3)(b)	Access in an alternative format	X	X	X	X	X
18(2)	Exempt banks	X	X	X	X	

19	Information obtained in confidence	X	X	X	X	
20	Federal-provincial affairs	X	X	X	X	
21	International affairs and defence	X	X	X	X	
22	Law enforcement and investigations	X	X	X	X	
23	Security clearances	X	X	X	X	
24	Individuals sentenced for an offence	X	X	X	X	
25	Safety of individuals	X	X	X	X	
26	Information about another individual	X	X	X	X	
27	Solicitor-client privilege	X	X	X	X	
28	Medical records	X	X	X	X	
31	Notice of intention to investigate	X	X	X		
33(2)	Right to make representations	X	X	X	X	
35(1)	Notice of actions to implement recommendations of Commissioner	X	X	X		
35(4)	Access to be given to complainant	X	X	X	X	
36(3)(b)	Notice of actions to implement recommendations of Commissioner concerning exempt banks	X	X	X		
51(2)(b), 51(3)	Special rules for hearings	X	X			
72	Annual report to Parliament	X	X	X		

Privacy Regulations Provisions and associated descriptions						
11(2), 11 (4)	Notification concerning corrections	X	X	X	X	X
13(1)	Disclosure of personal information relating to physical or mental health	X	X	X		
14	Examination in presence of medical practitioner or psychologist	X	X	X		

The following portion of the Delegation Order applies to records and information that are created, collected, maintained, used and disclosed by the Office of the Veterans Ombudsman.

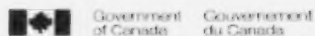
Position	Privacy Act	Privacy Regulations
Veterans Ombudsman	Full delegation	Full delegation
Director General of Operation	Full delegation	Full delegation
Legal Advisor	Full delegation	Full delegation
Director of Corporate Services and Charlottetown Operations	Full delegation	Full delegation


Minister of Veterans Affairs

APR 24 2012

Date

Annex 2: Statistical Report on the *Privacy Act* (VAC and OVO)



Statistical Report on the *Privacy Act*

Name of institution: Veterans Affairs Canada

Reporting period: 2014-04-01 to 2015-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	663
Outstanding from previous reporting period	179
Total	842
Closed during reporting period	771
Carried over to next reporting period	71

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	74	70	35	8	5	6	5	203
Disclosed in part	38	121	146	77	22	39	35	478
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	25	9	5	3	1	0	1	44
Request abandoned	26	7	3	3	0	1	6	46
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	163	207	189	91	28	46	47	771

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	1	22(1)(a)(ii)	1	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	1	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	3
19(1)(e)	0	22(2)	0	26	484
19(1)(f)	0	22.1	0	27	9
20	0	22.2	0	28	8
21	1	22.3	0		

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	0	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	0
69.1	0	70(1)(b)	0	70(1)(f)	0
		70(1)(c)	0	70.1	0

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	154	44	0
Disclosed in part	233	250	0
Total	387	294	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	17,561	16,946	203
Disclosed in part	415,284	239,061	478
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	1,442	946	46
Neither confirmed nor denied	0	0	0
Total	434,287	256,953	727

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	176	1,978	17	3,971	6	3,968	4	7,009	0	0
Disclosed in part	186	7,143	148	36,519	63	45,667	77	136,642	4	11,070
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	43	44	2	710	1	192	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	405	9165	167	43,200	70	49,867	81	143,651	4	11,070

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	7	6	0	0	13
Disclosed in part	31	3	0	0	34
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	1	2	0	0	3
Neither confirmed nor denied	0	0	0	0	0
Total	39	11	0	0	50

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
261	246	10	5	0

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline Where An Extension Was Taken	Total
1 to 15 days	35	20	55
16 to 30 days	13	19	32
31 to 60 days	20	25	45
61 to 120 days	13	20	33
121 to 180 days	6	16	22
181 to 365 days	9	24	33
More than 365 days	23	18	41
Total	119	142	261

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	1	0	1
Total	1	0	1

Part 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
5	1	0	6

Part 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	1
Total	1

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(iii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	23	0	3	0
Disclosed in part	203	0	45	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	3	0	0	0
Request abandoned	8	0	0	0
Total	237	0	48	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	237	0	48	0
Total	237	0	48	0

Part 6: Consultations Received From Other Institutions and Organizations

6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	6	207	0	0
Outstanding from the previous reporting period	1	21	0	0
Total	7	228	0	0
Closed during the reporting period	7	228	0	0
Pending at the end of the reporting period	0	0	0	0

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

Recommendation	Number of Days Required to Complete Consultation Requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	3	0	0	0	0	0	0	3
Disclosed in part	3	0	1	0	0	0	0	4
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	6	0	1	0	0	0	0	7

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Part 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
2	0	0	0	2

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	1
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Part 10: Resources Related to the Privacy Act

10.1 Costs

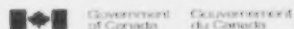
Expenditures		Amount
Salaries		\$1,602,040
Overtime		\$31,300
Goods and Services		\$352,284
• Professional services contracts	\$217,853	
• Other	\$134,431	
Total		\$1,985,624

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	17.72
Part-time and casual employees	3.16
Regional staff	0.00
Consultants and agency personnel	0.71
Students	2.69
Total	24.28

Note: Enter values to two decimal places.

Annex 3: Statistical Report on the *Privacy Act* (OVO)



Statistical Report on the *Privacy Act*

Name of institution: Office of the Veterans Ombudsman

Reporting period: 2014-04-01 to 2015-03-31

Part 1: Requests Under the *Privacy Act*

	Number of Requests
Received during reporting period	1
Outstanding from previous reporting period	0
Total	1
Closed during reporting period	1
Carried over to next reporting period	0

Part 2: Requests Closed During the Reporting Period

2.1 Disposition and completion time

Disposition of Requests	Completion Time							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	1	0	0	0	0	0	1
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	0	1	0	0	0	0	0	1

2.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	1
19(1)(f)	0	22.1	0	27	0
20	0	22.2	0	28	0
21	0	22.3	0		

2.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	0	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	0
69.1	0	70(1)(b)	0	70(1)(f)	0
		70(1)(c)	0	70.1	0

2.4 Format of information released

Disposition	Paper	Electronic	Other formats
All disclosed	0	0	0
Disclosed in part	1	0	0
Total	1	0	0

2.5 Complexity

2.5.1 Relevant pages processed and disclosed

Disposition of Requests	Number of Pages Processed	Number of Pages Disclosed	Number of Requests
All disclosed	0	0	0
Disclosed in part	80	37	1
All exempted	0	0	0
All excluded	0	0	0
Request abandoned	0	0	0
Neither confirmed nor denied	0	0	0
Total	80	37	1

2.5.2 Relevant pages processed and disclosed by size of requests

Disposition	Less Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More Than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
All disclosed	0	0	0	0	0	0	0	0	0	0
Disclosed in part	1	37	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	1	37	0	0	0	0	0	0	0	0

2.5.3 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	0	0	0	0
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	0	0	0	0

2.6 Deemed refusals

2.6.1 Reasons for not meeting statutory deadline

Number of Requests Closed Past the Statutory Deadline	Principal Reason			
	Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

2.6.2 Number of days past deadline

Number of Days Past Deadline	Number of Requests Past Deadline Where No Extension Was Taken	Number of Requests Past Deadline Where An Extension Was Taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	0	0

2.7 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Part 3: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
0	0	0	0

Part 4: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
Total	0

Part 5: Extensions

5.1 Reasons for extensions and disposition of requests

Disposition of Requests Where an Extension Was Taken	15(a)(i) Interference With Operations	15(a)(ii) Consultation		15(b) Translation or Conversion
		Section 70	Other	
All disclosed	0	0	0	0
Disclosed in part	0	0	0	0
All exempted	0	0	0	0
All excluded	0	0	0	0
No records exist	0	0	0	0
Request abandoned	0	0	0	0
Total	0	0	0	0

5.2 Length of extensions

Length of Extensions	15(a)(i) Interference with operations	15(a)(ii) Consultation		15(b) Translation purposes
		Section 70	Other	
1 to 15 days	0	0	0	0
16 to 30 days	0	0	0	0
Total	0	0	0	0

Part 6: Consultations Received From Other Institutions and Organizations

6.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	1	2	0	0
Outstanding from the previous reporting period	0	0	0	0
Total	1	2	0	0
Closed during the reporting period	1	2	0	0
Pending at the end of the reporting period	0	0	0	0

6.2 Recommendations and completion time for consultations received from other Government of Canada institutions

Recommendation	Number of Days Required to Complete Consultation Requests							
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	1	0	0	0	0	0	0	1
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	1	0	0	0	0	0	0	1

6.3 Recommendations and completion time for consultations received from other organizations

Recommendation	Number of days required to complete consultation requests							Total
	1 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	0	0	0	0	0	0	0
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

Part 7: Completion Time of Consultations on Cabinet Confidences

7.1 Requests with Legal Services

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

7.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		101-500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Part 8: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
0	0	0	0	0

Part 9: Privacy Impact Assessments (PIAs)

Number of PIA(s) completed	0
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Part 10: Resources Related to the Privacy Act**10.1 Costs**

Expenditures		Amount
Salaries		\$12,835
Overtime		\$0
Goods and Services		\$1,683
• Professional services contracts	\$1,683	
• Other	\$0	
Total		\$14,518

10.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.14
Part-time and casual employees	0.00
Regional staff	0.00
Consultants and agency personnel	0.00
Students	0.00
Total	0.14

Note: Enter values to two decimal places.

Annex 4: Five-Year Statistical Analysis (VAC and OVO)

	2010– 2011	2011– 2012	2012– 2013	2013– 2014	2014– 2015	Variance 2014–2015 and 2013–2014
Requests received	340	341	391	654	663	1%
Requests carried forward from prior year	15	94	173	292	179	-39%
Total requests requiring action	355	435	564	946	842	-11%
Completed requests	259	262	272	767	771	1%
Requests carried forward to next year	94	173	292	179	71	-60%
Completed in 30 days or less	177	108	109	310	370	19%
Exemptions invoked	170	157	116	411	508	24%
Pages released	88,823	65,266	62,667	228,010	256,953	12.7%
Privacy Act— Total costs of administration	\$1,164,723	\$1,137,586	\$1,532,815	\$1,765,494	\$1,985,624	12% (or +\$220,130)
FTEs	13.71	16.79	20.46	22.65	24.14	6% or +1.49
Complaints received	9	32	48	14	2	-86%
Complaints ruled on	4	17	15	46	18	-61%
PIAs completed	0	0	8	9	1	-89%